

REMARKS

OBJECTIONS TO THE DRAWINGS

The Office Action at page 2 objects to the drawings stating:

The drawings are objected to because the drawings elements are not clearly differentiated in that two drawing elements have the same names, both elements 318 and 322 are identified as "structural element identifier."

That is, the Office Actions asserts that two elements having the same names in a single view of the drawings cannot have different reference numbers. The law governing the objection in the Office Action, however, is 37 CFR § 1.84(p)(4) requiring, "The same part of an invention appearing in more than one view of the drawing must always be designated by the same reference character...." Applicants respectfully note in response that the structural element identifier (318) and structural element identifier (322) do not depict the same part of the invention in each pertinent view of the drawings. In each pertinent view of the drawings, the structural element identifier (318) is depicted inside the grammar element (316) to clearly indicate that the structural element identifier (318) is the structural element identifier (318) of the grammar element (316). In the drawings, the structural element identifier (322) is depicted inside the structured document (306) to clearly indicate that the structural element identifier (322) is the structural element identifier (322) of the structured document (306). The drawings, therefore, clearly distinguish the structural element identifier (318) from the structural element identifier (322). In addition to the drawings, the paragraph beginning at page 12, line 19, of the specification that describes the drawings also distinguishes the structural element identifier (318) from the structural element identifier (322). Because the drawings comply with 37 CFR § 1.84(p)(4), Applicants respectfully traverse the objection to the drawings and decline to amend the drawings at this time.

CLAIM REJECTIONS—35 U.S.C. § 102 OVER RAMAN

Claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Raman (U.S. Patent No. 5,748,186). To anticipate claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 under 35 U.S.C. § 102(b), two basic requirements must be met. The first requirement of anticipation is that Raman must disclose each and every element as set forth in Applicants' claims. The second requirement of anticipation is that Raman must enable Applicants' claims. Raman does not meet either requirement and therefore does not anticipate Applicants' claims.

Raman Does Not Disclose Each and Every Element Of The Claims Of The Present Application

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As explained in more detail below, Raman does not disclose each and every element of claim 1, and Raman therefore cannot be said to anticipate the claims of the present application within the meaning of 35 U.S.C. § 102.

Independent claim 1 of the present application claims:

1. A method for creating a presentation document, the method comprising:

creating, in dependence upon an original document, a structured document comprising one or more structural elements;

classifying a structural element of the structured document according to a presentation attribute; and

creating a presentation grammar for the structured document,
wherein the presentation grammar for the structured document
includes grammar elements each of which includes an identifier for
at least one structural element of the structured document.

Raman Does Not Disclose Classifying A Structural Element Of
The Structured Document According To A Presentation Attribute

The second element of claim 1 claims "classifying a structural element of the structured document according to a presentation attribute...." Regarding the second element of claim 1, the Office Action at page 4 states that Raman at column 2, lines 27-28, column 3, lines 41-44, column 5, line 47, through column 6, line 4, column 4, lines 38-49, discloses:

classifying a structural element of the structured document according to a presentation attribute; and (As disclosed in the application, classifying a structural element reads on parsing a structured documents into a hierarchical tree based on markup language tags as nodes of the tree structure. See, Raman col. 2, lines 27-28, teaching that the converted document is stored in the memory of a computer in the form of a hierarchical attribute tree. See, Raman, col. 3, lines 41-44, teaching recognizing file type by extension, i.e.: "html." See also, Raman, col. 5, lines 47 through col. 6, line 4, teaching identification of the document by tags, such as <html>. And see, Raman, col. 4, lines 38-49, teaching receiving a source document by characters encoded as text as well as marks placed in the text to define the structure, and the "recognizer" to parse the character stream into fundamental source elements, for example, title, sections, sub-sections, paragraphs, sentences, links, forms, and so forth. See also, Raman, col.5 lines 47 through col. 6, line 4, teaching identification of the document by text element tags, such as <head>, <title>, <body> and <P>.)

That is, the Office Action takes the position that Raman at column 2, lines 27-28, column 3, lines 41-44, column 5, line 47, through column 6, line 4, column 4, lines 38-49, discloses the second element of claim 1. Moreover, the Office Action asserts that the present application discloses that "classifying a structural element reads on parsing a structured documents into a hierarchical tree based on markup language tags as nodes of the tree structure." Applicants respectfully note in response, however, that the present application never once discloses that classifying a structural element of the structured document according to a presentation attribute 'reads on' parsing a structured document into a hierarchical tree based on markup language tags as nodes of the tree structure. In fact, the present application never even once mentions a 'tree,' 'hierarchical tree,' 'hierarchical tree based on markup language tags,' or 'parsing a structured document into a hierarchical tree based on markup language tags as nodes of the tree structure.'

Turning now to Raman at column 2, lines 27-28, Applicants respectfully note in response that what Raman at column 2, lines 27-28, in fact discloses is:

The common intermediate representation is stored in a memory of a computer system in the form of a hierarchical attribute tree.

That is, Raman at column 2, lines 27-28, discloses storing a common intermediate representation as a hierarchical attribute tree. Raman's storing a common intermediate representation as a hierarchical attribute tree is not classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 2, lines 27-28, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 3, lines 41-44, Applicants respectfully note in response that what Raman at column 3, lines 41-44, in fact discloses is:

The information 111 can be in the form of hyper-text mark-up language conforming to, for example, the standard HTML 2.0.

That is, Raman at column 3, lines 41-44, discloses information implemented as Hyper-Text Mark-up Language ('HTML'). Raman's disclosure of information implemented as HTML clearly does not disclose classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 3, lines 41-44, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 5, line 47, through column 6, line 4, Applicants respectfully note in response that what Raman at column 5, line 47, through column 6, line 4, in fact discloses is:

FIG. 3 shows a sample source document 300 which can be retrieved, recognized, and presented by the system 100 according to the invention. The text element <html> 310 indicates that this document is marked-up according to the HTML2.0 standard. Although this specific example of the preferred embodiment is described with reference to html, it should be understood that the invention can also be worked with other mark-up conventions, such as the ISO standard general mark-up language sgml, which similarly partitions the source document into structural elements.

The element <head> 320 indicates that a document header follows. The element <title> indicates that the following characters represent a title,

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e.g., Source Document, and the element </title> 340 indicates the end of the title element. The element </head> 350 indicates the end of the heading element. The sections <body> 360, <P> 361, and <ADDRESS> 362 denote distinct structural components of the document. The elements 380, and Home page 381 indicate a link to additional information. The link here is in the form of a WWW network address, also known as universal record locator (url). The elements </body> 390, and </html> 391 respectively denote the endings of the text body and the entire document.

That is, Raman at column 5, line 47, through column 6, line 4, discloses a source document mark-up according to the HTML 2.0 standard. Raman's disclosure of a source document mark-up according to the HTML 2.0 standard does not disclose classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 5, line 47, through column 6, line 4, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 4, lines 38-49, Applicants respectfully note in response that what Raman at column 4, lines 38-49, in fact discloses is:

Typically, the source document 111 is received by the retriever 120 as a sequential stream of digitally encoded signals, for example ASCII characters. The characters encode the text as well as the marks placed in the text to define the structure of the document 111; see FIG. 3 for description.

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The recognizer 130 parses the character stream into fundamental source elements, for example, title, sections, sub-sections, paragraphs, sentences, links, and forms, and so forth. The elements are stored in the intermediate high-level data structure 200.

That is, Raman at column 4, lines 38-49, discloses parsing the character stream of a source document into fundamental source elements. Raman's parsing the character stream of a source document into fundamental source elements is not classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 4, lines 38-49, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Raman Does Not Disclose Creating A Presentation Grammar For The Structured Document, Wherein The Presentation Grammar For The Structured Document Includes Grammar Elements Each Of Which Includes An Identifier For At Least One Structural Element Of The Structured Document

The third element of claim 1 claims "creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document." Regarding the third element of claim 1, the Office Action at page 4 states that Raman at column 2, lines 36-45, column 6, lines 30-33, column 3, lines 30-34, column 5, lines 38-46, claim 1, lines 13-15, column 4, lines 22-27, discloses:

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document. (See, Raman, col. 2, lines 36-45,

teaching the use of "control signals" as "presentation grammar" to control the modality being used to control the presentation. See, Raman, col. 6, lines 30-33, teaching that a control signal may include recognized speech as an input. See, also Raman, col. 3, lines 30-34, teaching that the data retriever and the presenter of the system may be controlled by voice recognized input couple to a speech recognizer. And see, Raman, col. 5, lines 38-46, teaching "navigational methods associated with objects allow the user to browse through the text by taking into consideration the underlying structure of the document." And see, Raman, claim 1, lines 13-15, teaching "presenting the common intermediate representation using a plurality of user communications modalities according to the hierarchical attribute trees." And see, Raman, col. 4, lines 22-27, teaching speech response to aural presentation of stock data. For each type of speech response, it is inherent that there be an associated grammar.)

That is, the Office Action takes the position that Raman at column 2, lines 36-45, column 6, lines 30-33, column 3, lines 30-34, column 5, lines 38-46, claim 1, lines 13-15, column 4, lines 22-27, discloses the third element of claim 1. Applicants respectfully note in response that what Raman at column 2, lines 36-45, in fact discloses is:

While presenting the information, the method receives control signals from a user using the plurality of user communication modalities. The control signals enable the user to interactively and independently control the receiving of the information and the presentation of the information in a plurality of presentation modalities.

As an advantage, the user can browse through the document taking the structure of the document into consideration. In addition, the user can control the presentation modality that is being used to render the document.

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That is, Raman at column 2, lines 36-45, discloses receives control signals from a user that enable the user to interactively and independently control the receiving of the information and the presentation of the information in a plurality of presentation modalities. Raman's receives control signals from a user is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 2, lines 36-45, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 6, lines 30-33, Applicants respectfully note in response that what Raman at column 6, lines 30-33, in fact discloses is:

Control signals or events can include key strokes, mouse clicks, or other user input, including recognized speech. Events can have associated priorities. An event with a higher priority may preempt the processing of lower priority events.

That is, Raman at column 6, lines 30-33, discloses that control signals or events may be implemented as user input and that events may have associated priorities. Raman's disclosure of control signals or events that may be implemented as user input is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 6, lines 30-33, does not even mention

'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 3, lines 30-34, Applicants respectfully note in response that what Raman at column 3, lines 30-34, in fact discloses is:

An interactive interface 150 coupled to I/O devices 160 can be used to control the retriever 120 and the presenter 140. The I/O devices 160 can include a monitor, a keyboard, a mouse, a telephone key-pad, a voice input unit coupled to a speech recognizer, and a speech synthesizer.

That is, Raman at column 3, lines 30-34, discloses an interactive interface connected to I/O devices. Raman's interactive interface connected to I/O devices is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 3, lines 30-34, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 5, lines 38-46, Applicants respectfully note in response that what Raman at column 5, lines 38-46, in fact discloses is:

Navigational methods associated with objects allow the user to browse through the text taking the underlying structure of the document 111 into consideration. As an advantage, the object can be rendered or viewed in a plurality of presentation modalities, e.g., visible, audible, tactile. Multiple modalities can be presented concurrently in a synchronized manner, and according to a predetermined style to facilitate the comprehension of the presented information.

That is, Raman at column 5, lines 38-46, discloses rendering or viewing a document taking the underlying structure of the document into consideration. Raman's rendering or viewing a document taking the underlying structure of the document into consideration is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 5, lines 38-46, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at claim 1, lines 13-15, Applicants respectfully note in response that what Raman at claim 1, lines 13-15, in fact discloses is:

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presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree....

That is, Raman at claim 1, lines 13-15, discloses presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree. Raman's presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 1, lines 13-15, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 4, lines 22-27, Applicants respectfully note in response that what Raman at column 4, lines 22-27, in fact discloses is:

The forms 115 are used to conduct a dialogue with the user. In the preferred embodiment of the invention, the user can select to interact with the forms 115 using speech. For example, the forms 115 can be used to get a stock or a financial transaction. The system can say the prompts of the transaction, and the user input can be processed by the speech input unit of the I/O 160.

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That is, Raman at column 4, lines 22-27, discloses forms used to conduct a dialogue with the user. Raman's forms used to conduct a dialogue with the user are not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 4, lines 22-27, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not disclose each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Raman Does Not Enable Each and Every Element
Of The Claims Of The Present Application

Not only must Raman disclose each and every element of the claims of the present application within the meaning of *Verdegaal* in order to anticipate Applicants' claims, but also Raman must be an enabling disclosure of each and every element of the claims of the present application within the meaning of *In re Hoeksema*, 399 F.2d 269, 158 USPQ 596 (CCPA 1968). In *Hoeksema*, the claims were rejected because an earlier patent disclosed a structural similarity to the applicant's chemical compound. The court in *Hoeksema* stated: "We think it is sound law, consistent with the public policy underlying our patent law, that before any publication can amount to a statutory bar to the grant of a patent, its disclosure must be such that a skilled artisan could take its teachings in combination with his own knowledge of the particular art and be in possession of the invention." *Id.*, 399 F.2d at 273, 158 USPQ at 600. The meaning of *Hoeksema* for the present case is that unless Raman places Applicants' claims in the possession of a person of ordinary skill in the art, Raman is legally insufficient to anticipate Applicants' claims under 35 USC 102(b).

Independent claim 1 of the present application claims:

1. A method for creating a presentation document, the method comprising:

creating, in dependence upon an original document, a structured document comprising one or more structural elements;

classifying a structural element of the structured document according to a presentation attribute; and

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.

Raman Does Not Place In The Possession Of A Person Of Ordinary Skill In The Art Classifying A Structural Element Of The Structured Document According To A Presentation Attribute

The second element of claim 1 claims "classifying a structural element of the structured document according to a presentation attribute...." Regarding the second element of claim 1, the Office Action at page 4 states that Raman at column 2, lines 27-28, column 3, lines 41-44, column 5, line 47, through column 6, line 4, column 4, lines 38-49, discloses:

classifying a structural element of the structured document according to a presentation attribute; and (As disclosed in the application, classifying a structural element reads on parsing a structured documents into a hierarchical tree based on markup language tags as nodes of the tree

structure. See, Raman col. 2, lines 27-28, teaching that the converted document is stored in the memory of a computer in the form of a hierarchical attribute tree. See, Raman, col. 3, lines 41-44, teaching recognizing file type by extension, i.e.: "html." See also, Raman, col. 5, lines 47 through col. 6, line 4, teaching identification of the document by tags, such as <html>. And see, Raman, col. 4, lines 38-49, teaching receiving a source document by characters encoded as text as well as marks placed in the text to define the structure, and the "recognizer" to parse the character stream into fundamental source elements, for example, title, sections, sub-sections, paragraphs, sentences, links, forms, and so forth. See also, Raman, col.5 lines 47 through col. 6, line 4, teaching identification of the document by text element tags, such as <head>, <title>, <body> and <P>.)

That is, the Office Action takes the position that Raman at column 2, lines 27-28, column 3, lines 41-44, column 5, line 47, through column 6, line 4, column 4, lines 38-49, discloses the second element of claim 1. Moreover, the Office Action asserts that the present application discloses that "classifying a structural element reads on parsing a structured documents into a hierarchical tree based on markup language tags as nodes of the tree structure." Applicants respectfully note in response, however, that the present application never once discloses that classifying a structural element of the structured document according to a presentation attribute 'reads on' parsing a structured document into a hierarchical tree based on markup language tags as nodes of the tree structure. In fact, the present application never even once mentions a 'tree,' 'hierarchical tree,' 'hierarchical tree based on markup language tags,' or 'parsing a structured document into a hierarchical tree based on markup language tags as nodes of the tree structure.' Applicants therefore deny the assertion in the Office Action that the present application discloses that classifying a structural element of the structured document according to a presentation attribute 'reads on' parsing a structured document into a hierarchical tree based on markup language tags as nodes of the tree structure.

Turning now to Raman at column 2, lines 27-28, Applicants respectfully note in response that what Raman at column 2, lines 27-28, in fact discloses is:

The common intermediate representation is stored in a memory of a computer system in the form of a hierarchical attribute tree.

That is, Raman at column 2, lines 27-28, discloses storing a common intermediate representation as a hierarchical attribute tree. Raman's storing a common intermediate representation as a hierarchical attribute tree is not classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 2, lines 27-28, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 3, lines 41-44, Applicants respectfully note in response that what Raman at column 3, lines 41-44, in fact discloses is:

The information 111 can be in the form of hyper-text mark-up language conforming to, for example, the standard HTML 2.0.

That is, Raman at column 3, lines 41-44, discloses information implemented as Hyper-Text Mark-up Language ('HTML'). Raman's disclosure of information implemented as HTML clearly does not disclose classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 3, lines 41-44, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants'

claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 5, line 47, through column 6, line 4, Applicants respectfully note in response that what Raman at column 5, line 47, through column 6, line 4, in fact discloses is:

FIG. 3 shows a sample source document 300 which can be retrieved, recognized, and presented by the system 100 according to the invention. The text element <html>310 indicates that this document is marked-up according to the HTML2.0 standard. Although this specific example of the preferred embodiment is described with reference to html, it should be understood that the invention can also be worked with other mark-up conventions, such as the ISO standard general mark-up language sgml, which similarly partitions the source document into structural elements.

The element <head> 320 indicates that a document header follows. The element <title> indicates that the following characters represent a title, e.g., Source Document, and the element </title> 340 indicates the end of the title element. The element </head> 350 indicates the end of the heading element. The sections <body> 360, <P> 361, and <ADDRESS> 362 denote distinct structural components of the document. The elements 380, and Home page 381 indicate a link to additional information. The link here is in the form of a WWW network address, also known as universal record locator (url). The elements </body> 390, and </html> 391 respectively denote the endings of the text body and the entire document.

That is, Raman at column 5, line 47, through column 6, line 4, discloses a source document mark-up according to the HTML 2.0 standard. Raman's disclosure of a source

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document mark-up according to the HTML 2.0 standard does not disclose classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 5, line 47, through column 6, line 4, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 4, lines 38-49, Applicants respectfully note in response that what Raman at column 4, lines 38-49, in fact discloses is:

Typically, the source document 111 is received by the retriever 120 as a sequential stream of digitally encoded signals, for example ASCII characters. The characters encode the text as well as the marks placed in the text to define the structure of the document 111; see FIG. 3 for description.

The recognizer 130 parses the character stream into fundamental source elements, for example, title, sections, sub-sections, paragraphs, sentences, links, and forms, and so forth. The elements are stored in the intermediate high-level data structure 200.

That is, Raman at column 4, lines 38-49, discloses parsing the character stream of a source document into fundamental source elements. Raman's parsing the character stream of a source document into fundamental source elements is not classifying a structural element of the structured document according to a presentation attribute as claimed in the present application. In fact, Raman at column 4, lines 38-49, does not even mention one word about a 'presentation attribute,' or 'classifying a structural element of the structured document according to a presentation attribute.' Because Raman does not place in the possession of a person of ordinary skill in the art each and

every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Raman Does Not Place In The Possession Of A Person Of Ordinary
Skill In The Art Creating A Presentation Grammar For The Structured
Document, Wherein The Presentation Grammar For The Structured Document
Includes Grammar Elements Each Of Which Includes An Identifier For At
Least One Structural Element Of The Structured Document

The third element of claim 1 claims "creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document." Regarding the third element of claim 1, the Office Action at page 4 states that Raman at column 2, lines 36-45, column 6, lines 30-33, column 3, lines 30-34, column 5, lines 38-46, claim 1, lines 13-15, column 4, lines 22-27, discloses:

creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document. (See, Raman, col. 2, lines 36-45, teaching the use of "control signals" as "presentation grammar" to control the modality being used to control the presentation. See, Raman, col. 6, lines 30-33, teaching that a control signal may include recognized speech as an input. See, also Raman, col. 3, lines 30-34, teaching that the data retriever and the presenter of the system may be controlled by voice recognized input couple to a speech recognizer. And see, Raman, col. 5, lines 38-46, teaching "navigational methods associated with objects allow the user to browse through the text by taking into consideration the underlying structure of the document." And see, Raman, claim 1, lines 13-15, teaching "presenting the common intermediate representation using a plurality of user communications modalities according to the

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hierarchical attribute trees.” And see, Raman, col. 4, lines 22-27, teaching speech response to aural presentation of stock data. For each type of speech response, it is inherent that there be an associated grammar.)

That is, the Office Action takes the position that Raman at column 2, lines 36-45, column 6, lines 30-33, column 3, lines 30-34, column 5, lines 38-46, claim 1, lines 13-15, column 4, lines 22-27, discloses the third element of claim 1. Applicants respectfully note in response that what Raman at column 2, lines 36-45, in fact discloses is:

While presenting the information, the method receives control signals from a user using the plurality of user communication modalities. The control signals enable the user to interactively and independently control the receiving of the information and the presentation of the information in a plurality of presentation modalities.

As an advantage, the user can browse through the document taking the structure of the document into consideration. In addition, the user can control the presentation modality that is being used to render the document.

That is, Raman at column 2, lines 36-45, discloses receives control signals from a user that enable the user to interactively and independently control the receiving of the information and the presentation of the information in a plurality of presentation modalities. Raman’s receives control signals from a user is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 2, lines 36-45, does not even mention ‘grammar,’ ‘presentation grammar,’ ‘grammar elements,’ ‘grammar elements each of which includes an identifier for at least one structural element of the structured document,’ or ‘creating a presentation grammar for the structured document, wherein the presentation grammar for

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the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 6, lines 30-33, Applicants respectfully note in response that what Raman at column 6, lines 30-33, in fact discloses is:

Control signals or events can include key strokes, mouse clicks, or other user input, including recognized speech. Events can have associated priorities. An event with a higher priority may preempt the processing of lower priority events.

That is, Raman at column 6, lines 30-33, discloses that control signals or events may be implemented as user input and that events may have associated priorities. Raman's disclosure of control signals or events that may be implemented as user input is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 6, lines 30-33, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 3, lines 30-34, Applicants respectfully note in response that what Raman at column 3, lines 30-34, in fact discloses is:

An interactive interface 150 coupled to I/O devices 160 can be used to control the retriever 120 and the presenter 140. The I/O devices 160 can include a monitor, a keyboard, a mouse, a telephone key-pad, a voice input unit coupled to a speech recognizer, and a speech synthesizer.

That is, Raman at column 3, lines 30-34, discloses an interactive interface connected to I/O devices. Raman's interactive interface connected to I/O devices is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 3, lines 30-34, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 5, lines 38-46, Applicants respectfully note in response that what Raman at column 5, lines 38-46, in fact discloses is:

Navigational methods associated with objects allow the user to browse through the text taking the underlying structure of the document 111 into consideration. As an advantage, the object can be rendered or viewed in a plurality of presentation modalities, e.g., visible, audible, tactile. Multiple modalities can be presented concurrently in a synchronized manner, and

according to a predetermined style to facilitate the comprehension of the presented information.

That is, Raman at column 5, lines 38-46, discloses rendering or viewing a document taking the underlying structure of the document into consideration. Raman's rendering or viewing a document taking the underlying structure of the document into consideration is not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 5, lines 38-46, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at claim 1, lines 13-15, Applicants respectfully note in response that what Raman at claim 1, lines 13-15, in fact discloses is:

presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree....

That is, Raman at claim 1, lines 13-15, discloses presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree. Raman's presenting the common intermediate representation using a plurality of user communication modalities according to the hierarchical attribute tree is not creating a presentation grammar for the structured document, wherein the

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presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at claim 1, lines 13-15, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Turning now to Raman at column 4, lines 22-27, Applicants respectfully note in response that what Raman at column 4, lines 22-27, in fact discloses is:

The forms 115 are used to conduct a dialogue with the user. In the preferred embodiment of the invention, the user can select to interact with the forms 115 using speech. For example, the forms 115 can be used to get a stock or a financial transaction. The system can say the prompts of the transaction, and the user input can be processed by the speech input unit of the I/O 160.

That is, Raman at column 4, lines 22-27, discloses forms used to conduct a dialogue with the user. Raman's forms used to conduct a dialogue with the user are not creating a presentation grammar for the structured document, wherein the presentation grammar for the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document as claimed in the present application. In fact, Raman at column 4, lines 22-27, does not even mention 'grammar,' 'presentation grammar,' 'grammar elements,' 'grammar elements each of which includes an identifier for at least one structural element of the structured document,' or 'creating a presentation grammar for the structured document, wherein the presentation grammar for

the structured document includes grammar elements each of which includes an identifier for at least one structural element of the structured document.' Because Raman does not place in the possession of a person of ordinary skill in the art each and every element and limitation of Applicants' claims, Raman does not anticipate Applicants' claims, and the rejections should be withdrawn.

Relations Among Claims

Independent claim 1 is patentable for the reasons discussed above. Independent claims 12 and 23 claim system and computer program product aspects of the method claimed in independent claim 1. Independent claims 12 and 23 therefore are patentable for the same reasons that claim 1 is patentable as described above. Dependent claims 2-4 and 7-9 depend from independent claim 1. Dependent claims 13-15 and 18-20 depend from independent claim 12. Dependent claims 24-26 and 29-31 depend from independent claim 23. The dependent claims include each and every element and limitation of the independent claims from which they depend. The dependent claims stand because their respective independent claims stand. Claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually below and request reconsideration of claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31.

CLAIM REJECTIONS – 35 U.S.C. § 103

Claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Raman (U.S. Patent No. 5,748,186) in view of Josephson (U.S. Patent Publication 2003/023435 A1). The rejection of claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33 relies on the previous 35 U.S.C. § 102 rejection arguing that Raman discloses each and every element and limitation of independent claims 1, 12, and 23. Applicants have demonstrated above that Raman does not disclose each and every element of independent claims 1, 12, and 23.

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To establish a prima facie case of obviousness, the proposed combinations of the references must teach or suggest all of the claim limitations of dependent claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). Dependent claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33 depend from independent claims 1, 12, and 23 respectively and include all of the limitations of the claims from which they depend. Because the proposed combinations rely on the argument that Raman teaches each and every element claims 1, 12, and 23, and because Raman in fact does not teach or suggest each and every element of claim 1, 12, and 23, the proposed combinations cannot teach or suggest all the claim limitations of claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33. The proposed combinations therefore cannot establish a prima facie case of obviousness and the rejections should be withdrawn.

CONCLUSION

The Office Action objects to the drawings based on the assertion that two elements having the same names in a single view of the drawings cannot have different reference numbers. The law governing the objection in the Office Action, however, is 37 CFR § 1.84(p)(4). Because the drawings, in fact, comply with 37 CFR § 1.84(p)(4), Applicants traverse the objection to the drawings and decline to amend the drawings at this time.

Claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 stand rejected under 35 U.S.C § 102(b) as being anticipated by Raman (U.S. Patent No. 5,748,186). For the reasons explained above, Raman does not disclose each and every element of claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 and Raman does not place one of skill in the art in possession of claim 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31. Raman therefore does not anticipate claims 1-4, 7-9, 12-15, 18-20, 23-26, and 29-31 and the rejections should be withdrawn.

Claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Raman (U.S. Patent No. 5,748,186) in view of Josephson (U.S. Patent Publication 2003/023435 A1). Because the proposed combinations rely on the argument that Raman teaches each and every element claims 1,

12, and 23, and because Raman in fact does not teach or suggest each and every element of claim 1, 12, and 23, the proposed combinations cannot teach or suggest all the claim limitations of claims 5-6, 10-11, 16-17, 21-22, 27-28, and 32-33. The proposed combinations therefore cannot establish a prima facie case of obviousness and the rejections should be withdrawn. Claims 1-33 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually below and request reconsideration of claims 1-33.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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By: _____

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